

1 IN THE UNITED STATES DISTRICT COURT FOR THE
 2 NORTHERN DISTRICT OF OKLAHOMA
 3
 4

5 W. A. DREW EDMONDSON, in his)
 6 capacity as ATTORNEY GENERAL)
 7 OF THE STATE OF OKLAHOMA and)
 8 OKLAHOMA SECRETARY OF THE)
 9 ENVIRONMENT C. MILES TOLBERT,)
 10 in his capacity as the)
 11 TRUSTEE FOR NATURAL RESOURCES)
 12 FOR THE STATE OF OKLAHOMA,)

13 Plaintiff,)

14 vs.)

4:05-CV-00329-TCK-SAJ

15 TYSON FOODS, INC., et al,)

16 Defendants.)

17 - - - - -
 18 THE VIDEOTAPED DEPOSITION OF
 19 MONTY HENDERSON, produced as a witness on behalf
 20 of the Plaintiff in the above styled and numbered
 21 cause, taken on the 20th day of August, 2008, in the
 22 City of Fayetteville, County of Washington, State of
 23 Arkansas, before me, Lisa A. Steinmeyer, a Certified
 24 Shorthand Reporter, duly certified under and by
 25 virtue of the laws of the State of Oklahoma.

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Exhibit 2

1 areas of the country where poultry operations are
2 some of the most intense?

3 MR. GRAVES: Object to the form.

4 A I would have to guess, but I would say yes,
5 that's correct. 11:34AM

6 Q The IRW has -- wouldn't you regard that as
7 being or having intensive concentrated poultry
8 operations?

9 A Sections of it, yes. Sections of the IRW have
10 several poultry houses in them. 11:34AM

11 Q Well, I'm talking about more than several.
12 I'm talking about whether you'd use the term that it
13 has a concentration of poultry operations.

14 A Yes, I would say that.

15 Q Can you compare that with the intensity of 11:34AM
16 poultry operations in other parts of the country?

17 MR. GRAVES: Object to the form.

18 A I can't compare that. I know that there's a
19 lot of poultry grown in the Illinois River
20 watershed. I can't compare it. 11:34AM

21 Q But when we read this about certain areas
22 where the quantity of litter produced and the
23 available land are not balanced, do you not agree
24 with me that you have to be concerned that the
25 Illinois River watershed might be one of those 11:35AM

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